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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF OREGON**  
9 **MEDFORD DIVISION**

10 **In re the Matter of J.P. and E.P.:**

11 ARNAUD PARIS,

12 **Petitioner,**

13 **and**

14 HEIDI MARIE BROWN,

15 **Respondent.**

**Civil Action No. 1:24-cv-00648-AA**

**PETITIONER'S EMERGENCY  
MOTION FOR UNSUPERVISED  
AND DIRECT COMMUNICATION  
WITH FATHER**

**NOTE ON MOTION CALENDAR:**  
**EXPEDITED HEARING REQUESTED**

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17 Mother just committed a child abduction in the middle of the school year in France  
18 and she is now refusing to disclose where the children are currently in the US or to let  
19 proper communication happen between Father and the children without supervision.

20 The petitioner, Father, Arnaud Paris, moves for an order permitting his visitation  
21 and/or unsupervised communication with the parties' children during this Hague Action and  
22 for this Honorable Court to ensure that Mother isn't manipulating the children, alienating  
23 them against their Father and adding further strong psychological trauma onto them in  
24 continuation to the abduction she just conducted from France taking our children on a  
25

**EMERGENCY MOTION FOR UNSUPERVISED AND  
DIRECT COMMUNICATION WITH FATHER—**

1 fugitive escape run from Europe avoiding border controls. Here are the recent facts  
2 supporting that request:  
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4 1. On April 18<sup>th</sup> at 7.24pm PST Mother was in a car with the children and called  
5 Father on the car speaker from a hidden number that's not her known number. Considering  
6 the time difference, it was 4.24am in France. The children were in the back of the car while  
7 Mother was front row to this discussion on car speaker as well. See attached **Exhibit 04**,  
8 showing the time Mother called in France on April 18<sup>th</sup> ("hier" in French means yesterday)  
9 from an unknown number ("Numéro masque").  
10

11 2. Over the short 2mn phone communication of which only 15 seconds were  
12 really communication between Father and his children, Eva and Juliette said twice: "Dad  
13 you have to do what mum says or she will get angry!". Which indicates that the children are  
14 under some strong intimidation or even possibly a mental state of terror as a result from the  
15 abduction. This also shows signs of parental alienation against Father on the part of Mother  
16 who has documented history of using psychological pressure onto her children.  
17

18 3. During this short phone call, Father asked if the children were safe and where  
19 they were since Father had had no news from Mother about the whereabouts of his children  
20 since they were kidnapped from France, except that they were back in the US. Mother  
21 literally hang up the phone on Father in the middle of the discussion because of that.  
22

23 4. It is to be noted that Father had always been establishing proper contact in  
24 France between the children and their Mother, organizing calls several times a week and  
25

1 always at decent hours for Mother being on the West Coast of the US. Father has always let  
2 the communication from France happen in video with children being unsupervised.

3  
4 5. On April 17<sup>th</sup> Mother sent an email to Father saying that she now gets to  
5 choose the day she has the kids talk to Father per her local Oregon judgment. A judgment  
6 that was obtained in total contradiction to the French judgment that was first to file and first  
7 to judgment in France, and that Mother obtained also without Father having been allowed to  
8 defend himself. In this email Mother says to Father about the communication with the  
9 children:  
10

11 *"The days for the calls are at my discretion - see page 19 of the attached. Per the*  
12 *court order they would be between 6pm and 8pm. As I said in my last email, we will*  
13 *attempt to call you today and tomorrow evening. If you are unable to make that time*  
14 *work, please let me know."*  
15

16 (See attached **Exhibit 02**, email sent by Miss Brown to Mr. Paris on April 17<sup>th</sup>.)

17 Mother justified in this email that she can call Father in the middle of the night because  
18 that's what her Oregon judgment was saying. Mother knew very well that Father is living in  
19 France and that the 6-8pm time from her judgment would be in the middle of the night in  
20 France and yet she makes no effort to have the communication to happen at decent hours.  
21 She easily could have organized these calls to be in the morning Oregon time which is  
22 evening time in France.  
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24 6. Mother also said in her email from April 17<sup>th</sup> to Father that she could also  
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1 decide what day she would have children call Father. Which means that Mother could wake  
2 up Father or keep him up in the middle of the night any day she wants for him to be awake  
3 to have a chance to speak with his children.  
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5 7. It is now clear that Mother is using an Oregon judgment, that was obtained  
6 without due process and in bad faith while she was already participating in the French  
7 custody action, to damage the communication between the children and their Father. For  
8 that reason, it is crucial that this Honorable Court set aside that judgment from December  
9 28<sup>th</sup> which is giving the possibility to Mother to force a of dictatorial relationship onto  
10 Father and the children.  
11

12 8. The judgment in question doesn't have to be given full faith and credit by this  
13 Honorable Court because it was obtained without due process and was in complete violation  
14 of Father's constitutional rights, especially when a Hague Action on the kidnapping of these  
15 very same children by Mother just happened from France and is in front of this Honorable  
16 Court. See attached **Exhibit 03**, the email sent Father's US attorney explaining how he was  
17 forbidden to participate and represent Father in the Oregon court. This behavior from the  
18 Oregon court to not give due process to a party to be defended is highly unconstitutional and  
19 constitutes a breach of Father's civil rights. This was recently confirmed by the Oregon  
20 Appellate Court decision in the Appeal Case number A181544. See attached **Exhibit 01**.  
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23 9. More importantly, as part of the Oregon proceedings done without due  
24 process that granted Mother that judgment from December 28<sup>th</sup> 2023, Mother obtained from  
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1 the Judge a warrant for Father's arrest in all states just because Father was in France under  
2 his French judgment refusing to present himself in person to the court. Mother knew at that  
3 time that she was going to commit a kidnapping and that she could as a result ensure that  
4 Father would not be able to see his children again since he couldn't come back to the US  
5 due to that warrant for his arrest. This is another example of how Mother is implementing  
6 her plan to sever permanently the link between Father and the children.  
7

8 10. For all these reasons it is crucial that the children don't become any further  
9 victims of this situation and that they don't be influenced or manipulated by their mother  
10 against Father and that a proper unsupervised and daily access be implemented to allow the  
11 children to communicate with their Father. Preferably this daily connection to Father would  
12 have to happen in a place outside of Mother's home.  
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14

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16 **LEGAL ARGUMENT:**

17 This court has the legal authority to grant Mr. Paris access to/visitation and to have  
18 unsupervised communication with the children.

19 22 USC § 9001(a)(4) states in pertinent part as follows:

20 *"The Convention on the Civil Aspects of International Child Abduction, done at The Hague*  
21 *on October 25, 1980, establishes legal rights and procedures for the*  
22 *prompt return of children who have been wrongfully removed or retained, as well*  
23 *as for securing the exercise of visitation rights. (Emphasis added.)"*  
24  
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1 Additionally, 22 USC § 9004(a) states in pertinent part that:

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3 *“In furtherance of the objectives of article 7(b) and other provisions of the Convention, and*  
4 *subject to the provisions of subsection (b) of this section, any court exercising jurisdiction of*  
5 *an action brought under section 9003(b) of this title may take or cause to be taken measures*  
6 *under Federal or State law, as appropriate, to protect the well-being of the child*  
7 *involved[.] (Emphasis added.)”*

8  
9 Hague Convention Article 7(b) specifically provides for the fashioning of “provisional  
10 remedies” to protect a child or avoid prejudice to “interested parties” such as the petitioner  
11 herein.

12 **CONCLUSION AND PRAYER FOR RELIEF:**

13 For the foregoing reasons, Mr. Paris seeks entry of an expedited order granting him a  
14 direct line of communication with the children without Mother’s supervision. Father  
15 remains ready and anxious to exercise continuous unsupervised communication with them  
16 prior to the conclusion of this matter and asks that they each be given an apple watch with  
17 parental control under Father’s supervision to ensure that Mother isn’t interfering with that  
18 communication and that a proper cell plan be activated by Mother on each of these watches  
19 (limited to communication only with Father and Mother).  
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3 DATED this 19th day of April, 2024, in Paris, France

4 Submitted by:  
5 Arnaud PARIS, Pro Per

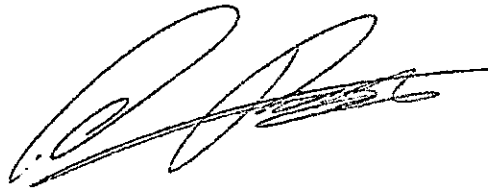
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10 **VERIFICATION**

11 I, Arnaud Paris, declare under penalty of perjury under the laws of the United States  
12 of America that the foregoing is true and correct.

13 SIGNED AND DATED this 19th day of April, 2024, in Paris, France.

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15 

16  
17  
18 Arnaud Paris

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITIONER'S EMERGENCY MOTION FOR UNSUPERVISED AND DIRECT COMMUNICATION WITH FATHER** on the following party:

Heidi Marie Brown  
2256 Abbott Ave  
Ashland, OR 97520  
heidimparis@gmail.com  
Respondent

By the following method or methods:

\_\_\_\_\_ by **mailing** full, true, and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the attorney(s) as shown above, the last known office address of the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.

X by **emailing** full, true, and correct copies thereof to the attorney(s) at the email address shown above, which is the last known email address for the attorney(s) office, on the date set forth below.

\_\_\_\_\_ by **faxing** full, true, and correct copies thereof to the attorney(s) at the fax number(s) shown above, which is the last known fax number for the attorney(s) office, on the date set forth below. The receiving fax machines were operating at the time of service and the transmission was properly completed.

\_\_\_\_\_ by selecting the individual(s) listed above as a service contact when preparing this electronic filing submission, thus causing the individual(s) to be served by means of the **court's electronic filing system**.

DATED this 19th day of April, 2024, in Paris, France.

By: \_\_\_\_\_  
ARNAUD PARIS, Petitioner

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**EMERGENCY MOTION FOR UNSUPERVISED AND  
DIRECT COMMUNICATION WITH FATHER—**